

C. D. WOLBACH, Ph.D.
Air Pollution Control Officer

DONNA ROBERTS NASH
Office Manager



306 East Gobbi Street
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COUNTY OF MENDOCINO
AIR QUALITY MANAGEMENT DISTRICT
UKIAH, CALIFORNIA 95482

RECEIVED

MAY 28 2002

Permits Office Air-3
U.S. EPA, Region 9

May 20, 2002

Forrest D. Denney
Environmental Manager – Lumber Division
Georgia Pacific Corporation
P. O. Box 105605
Atlanta, GA 30348

Subject: Administrative Changes to Title V Permit to Operate, Special Conditions.

Dear Mr. Denney:

Thank you for your e-mail of May 2nd regarding the two remaining references to urban wood waste in the Georgia Pacific Title V Permit to Operate. Those references have been removed as part of the administrative changes requested by Georgia Pacific on March 27, 2002. In addition, three corresponding references to demolition wood waste have been removed. Please remember that by removal of this language, Georgia Pacific is no longer allowed to use urban wood waste (demolition wood) as fuel for the boilers at the Fort Bragg facility. Attached are replacement pages 28, 30, 31, 33, and 35 of the Title V Permit to Operate. These pages reflect the changes requested. Please replace these pages in all copies of the permit.

Thank you. If you have questions, please call the District office at 707/463-4354.

Sincerely,

C.D. Wolbach, Ph.D.
Air Pollution Control Officer

CDW:dmr

A^Title V\GPW Ltr 5-120-02

IV Process 4 – Powerhouse Line**A. Equipment Item No. 46 – Boiler No. 1****1. Basic equipment**

Source: Wood waste stoker steam boiler
Make: Riley Stoker
Model:
Serial No:
Power source: Wood bark, back-up oil
Design Rate: 143MMBtu/hr (wood bark rating)
Burner design: Stoker, fixed grate
Comments: Nominal flue gas characteristics: 160F; 57,279 SCFM; 39,504 DSCFM; 31% H₂O; 14.7% CO₂

2. Control Equipment - Multiclones, and wet scrubber (E38)**3. Monitoring Equipment – Steam production rates****4. Emissions Limitations****a. Particulate Matter****i. Particulate loading –**

PERMITTEE shall not cause to be discharged particulate matter into the atmosphere in excess of 0.20 gr/scf (0.46 grams per standard cubic meter) of exhaust gas, calculated to 12 percent carbon dioxide (CO₂) determined by CARB Method 5 total catch.

[Auth §IV(A)(4)(a)(i): Federal 40 CFR 60.42(a)(1); MCAQMD Regulation 1, Rule 420(b), MCAQMD Permit No. 0120-1-20-76-20-1]

ii. Visible emissions –

PERMITTEE shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity for any period or periods aggregating more than 3 minutes in any one hour period. The opacity standard applies at all times except for periods of start-up, shutdown, and malfunction.–The standard shall not be exceeded during start-up, shutdown, or malfunction for more than 30 minutes in any rolling twenty-four (24) hour period.

[Auth §IV(A)(4)(a)(ii): H&SC 41704(n), MCAQMD Regulation 1, Rule 410(b), MCAQMD Permit No. 0120-1-20-76-20-1]

b. Carbon Monoxide – NA**c. Nitrogen Oxides – NA****d. Sulfur Oxides - NA****e. Hydrocarbons – NA****f. HAPs– NA**

7. Operating Conditions

- a. PERMITTEE shall use only wood waste products (bark, chips, sawdust) as primary fuel with standby use of fuel oil allowed only during periods of grate cleaning, main fuel feed failure, or other bonafide emergencies.
- b. PERMITTEE shall report all equipment malfunctions or breakdowns to the District in accordance with Mendocino County Air Quality Management District Regulation 1, Rule 450.

[Auth. §IV (A)(7)(a) & (b): MCAQMD Permit No. 0120-1-20-76-20-1]

- c. Fuel Limitations (See Section V(A))

B. Equipment Item No. 48 – Boiler No. 2

1. Basic Equipment

Source: Wood waste stoker steam boiler
Make: Riley Stoker
Model:
Serial No:
Power source: Wood bark, back-up oil
Design Rate: 143MMBtu/hr (wood bark rating)
Burner design: Stoker, fixed grate
Comments: Nominal flue gas characteristics: 160F; 57,279 SCFM; 39,504 DSCFM; 31% H₂O; 14.7% CO₂

2. Control Equipment - Multiclones and wet scrubber (E40)

3. Monitoring Equipment – Steam production rates

4. Emissions Limitations

a. Particulate Matter

i. Particulate loading

PERMITTEE shall not cause to be discharged into the atmosphere particulate matter in excess of 0.20 gr/scf (0.46 grams per standard cubic meter) of exhaust gas, calculated to 12 percent carbon dioxide (CO₂)-determined by CARB Method 5 total catch.

[Auth. §IV(B)(4)(a)(i): Federal 40 CFR 60.42(a)(1); MCAQMD Regulation 1, Rule 420(b), MCAQMD Permit No. 0120-1-21-76-21-1]

ii. Visible emissions

PERMITTEE shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity for any period or periods aggregating more than 3 minutes in any one hour period. The opacity standard applies at all times except for periods of start-up, shutdown, and malfunction.—The standard shall not be exceeded during start-up, shutdown, or malfunction for more than 30 minutes in any rolling twenty-four (24) hour period.

[Auth. §IV(B)(4)(a)(ii): H&SC 41704(n), MCAQMD Regulation 1, Rule 410(b), MCAQMD Permit No. 0120-1-21-76-21-1]

b. Carbon Monoxide - NA

c. Nitrogen Oxides – NA

d. Sulfur Oxides - NA

e. Hydrocarbons - NA

f. HAPs – NA

7. Operating Conditions

- a. PERMITTEE shall use only wood waste products (bark, chips, sawdust) as primary fuel with standby use of fuel oil allowed only during periods of grate cleaning, main fuel feed failure, or other bonafide emergencies.
- b. PERMITTEE shall report all equipment malfunctions or breakdowns to the District in accordance with Mendocino County Air Quality Management District Regulation 1, Rule 450.

[Auth §IV(B)(7)(a) & (b): MCAQMD Permit No. 0120-1-201-76-21-1]

- c. Fuel Limitations (See §V(A))

- b. Carbon Monoxide - NA
 - c. Nitrogen Oxides – (Note: Limited by steam production and fuel use limits under §IV(C)(7)(a) and §V(A)(1) below.)
[Auth. §IV(C)(4)(c): Federal 40 CFR 60.44b(c)]
 - d. Sulfur Oxides – (Note: Limited by sulfur content limits on fuel and fuel use limits under §IV(C)(6)(c))
[Auth. §IV(C)(4)(d): Federal 40 CFR 60.44b(c)]
 - e. Hydrocarbons - NA
 - f. HAPs – NA
5. Monitoring for Compliance
- a. Particulate loading
Particulate loading shall be monitored using CARB Method. PERMITTEE shall conduct performance testing for particulate material once per year. If the compliance test result is less than one-half the permitted standard, then the District may waive the next year compliance test.
 - b. Visible emissions
PERMITTEE shall conduct performance testing for visible emissions once per quarter. Visible emissions shall be monitored using EPA Method 9 of 40 CFR Part 60 App. A or other EPA approved method.
 - c. Carbon monoxide
PERMITTEE shall conduct performance testing for carbon monoxide during each compliance test for particulate emissions. Carbon monoxide shall be monitored using EPA Method 10 of 40 CFR Part 60 App. A, or other EPA approved method.
 - d. Nitrogen Oxides
PERMITTEE shall conduct performance testing for nitrogen oxides once per year. Nitrogen oxides shall be monitored using EPA Methods 7-7E of 40 CFR Part 60 App. A, or other EPA approved methods.
 - e. Sulfur oxides
Sulfur oxide emissions shall be determined by calculating estimated annual emissions from fuel oil sulfur content and fuel consumption. PERMITTEE shall report the results of the calculations once per year. (See §IV(C)(6)(c)(iv) & (v)).
[Auth. §IV(C)(5): MCAQMD Regulation 5, Rule 5.620]
 - f. HAPS (See also §V(A)(6)
PERMITTEE shall conduct performance testing for heavy metals emissions at the discretion of the District, but no more frequently than once per annum. Heavy metals emissions shall be monitored using CARB Method 436.

IV Process 4 – Powerhouse Line**A. Equipment Item No. 46 – Boiler No. 1****1. Basic equipment**

Source: Wood waste stoker steam boiler
 Make: Riley Stoker
 Model:
 Serial No:
 Power source: Wood bark, back-up oil
 Design Rate: 143MMBtu/hr (wood bark rating)
 Burner design: Stoker, fixed grate
 Comments: Nominal flue gas characteristics: 160F; 57,279 SCFM; 39,504 DSCFM; 31% H₂O; 14.7% CO₂

2. Control Equipment - Multiclones, and wet scrubber (E38)**3. Monitoring Equipment – Steam production rates****4. Emissions Limitations****a. Particulate Matter****i. Particulate loading –**

PERMITTEE shall not cause to be discharged particulate matter into the atmosphere in excess of 0.20 gr/scf (0.46 grams per standard cubic meter) of exhaust gas, calculated to 12 percent carbon dioxide (CO₂) determined by CARB Method 5 total catch.

[Auth §IV(A)(4)(a)(i): Federal 40 CFR 60.42(a)(1); MCAQMD Regulation 1, Rule 420(b), MCAQMD Permit No. 0120-1-20-76-20-1]

ii. Visible emissions –

PERMITTEE shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity for any period or periods aggregating more than 3 minutes in any one hour period. The opacity standard applies at all times except for periods of start-up, shutdown, and malfunction.–The standard shall not be exceeded during start-up, shutdown, or malfunction for more than 30 minutes in any rolling twenty-four (24) hour period.

[Auth §IV(A)(4)(a)(ii): H&SC 41704(n), MCAQMD Regulation 1, Rule 410(b), MCAQMD Permit No. 0120-1-20-76-20-1]

b. Carbon Monoxide – NA**c. Nitrogen Oxides – NA****d. Sulfur Oxides - NA****e. Hydrocarbons – NA****f. HAPs– ~~NA (Note: Limited by individual metals content limits on purchased demolition wood waste fuel under §V(A)(3)-(5).)~~**

7. Operating Conditions

- a. PERMITTEE shall use only wood waste products (bark, chips, sawdust, ~~and urban wood waste~~) as primary fuel with standby use of fuel oil allowed only during periods of grate cleaning, main fuel feed failure, or other bonafide emergencies.
- b. PERMITTEE shall report all equipment malfunctions or breakdowns to the District in accordance with Mendocino County Air Quality Management District Regulation 1, Rule 450.

[Auth. §IV (A)(7)(a) & (b): MCAQMD Permit No. 0120-1-20-76-20-1]

- c. Fuel Limitations (See Section V(A))

B. Equipment Item No. 48 – Boiler No. 2

1. Basic Equipment

Source: Wood waste stoker steam boiler
Make: Riley Stoker
Model:
Serial No:
Power source: Wood bark, back-up oil
Design Rate: 143MMBtu/hr (wood bark rating)
Burner design: Stoker, fixed grate
Comments: Nominal flue gas characteristics: 160F; 57,279 SCFM; 39,504 DSCFM; 31% H₂O; 14.7% CO₂

2. Control Equipment - Multiclones and wet scrubber (E40)

3. Monitoring Equipment – Steam production rates

4. Emissions Limitations

a. Particulate Matter

i. Particulate loading

PERMITTEE shall not cause to be discharged into the atmosphere particulate matter in excess of 0.20 gr/scf (0.46 grams per standard cubic meter) of exhaust gas, calculated to 12 percent carbon dioxide (CO₂)-determined by CARB Method 5 total catch.

[Auth. §IV(B)(4)(a)(i): Federal 40 CFR 60.42(a)(1); MCAQMD Regulation 1, Rule 420(b), MCAQMD Permit No. 0120-1-21-76-21-1]

ii. Visible emissions

PERMITTEE shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity for any period or periods aggregating more than 3 minutes in any one hour period. The opacity standard applies at all times except for periods of start-up, shutdown, and malfunction.–The standard shall not be exceeded during start-up, shutdown, or malfunction for more than 30 minutes in any rolling twenty-four (24) hour period.

[Auth. §IV(B)(4)(a)(ii): H&SC 41704(n), MCAQMD Regulation 1, Rule 410(b), MCAQMD Permit No. 0120-1-21-76-21-1]

b. Carbon Monoxide - NA

c. Nitrogen Oxides – NA

d. Sulfur Oxides - NA

e. Hydrocarbons - NA

f. HAPs – ~~NA (Note: Limited by individual metals content limits on purchased demolition wood waste fuel under §V(A)(3)-(5).)~~

7. Operating Conditions

- a. PERMITTEE shall use only wood waste products (bark, chips, sawdust, ~~and hogged urban wood waste~~) as primary fuel with standby use of fuel oil allowed only during periods of grate cleaning, main fuel feed failure, or other bonafide emergencies.
- b. PERMITTEE shall report all equipment malfunctions or breakdowns to the District in accordance with Mendocino County Air Quality Management District Regulation 1, Rule 450.

[Auth §IV(B)(7)(a) & (b): MCAQMD Permit No. 0120-1-201-76-21-1]

- c. Fuel Limitations (See §V(A))

- b. Carbon Monoxide - NA
- c. Nitrogen Oxides – (Note: Limited by steam production and fuel use limits under §IV(C)(7)(a) and §V(A)(1) below.)

[Auth. §IV(C)(4)(c): Federal 40 CFR 60.44b(c)]

- d. Sulfur Oxides – (Note: Limited by sulfur content limits on fuel and fuel use limits under §IV(C)(6)(c))

[Auth. §IV(C)(4)(d): Federal 40 CFR 60.44b(c)]

- e. Hydrocarbons - NA
- f. HAPs – ~~NA (Note: Limited by individual metals content limits on purchased demolition wood waste fuel under §V(A)(3)-(5).)~~

5. Monitoring for Compliance

- a. Particulate loading

Particulate loading shall be monitored using CARB Method. PERMITTEE shall conduct performance testing for particulate material once per year. If the compliance test result is less than one-half the permitted standard, then the District may waive the next year compliance test.

- b. Visible emissions

PERMITTEE shall conduct performance testing for visible emissions once per quarter. Visible emissions shall be monitored using EPA Method 9 of 40 CFR Part 60 App. A or other EPA approved method.

- c. Carbon monoxide

PERMITTEE shall conduct performance testing for carbon monoxide during each compliance test for particulate emissions. Carbon monoxide shall be monitored using EPA Method 10 of 40 CFR Part 60 App. A, or other EPA approved method.

- d. Nitrogen Oxides

PERMITTEE shall conduct performance testing for nitrogen oxides once per year. Nitrogen oxides shall be monitored using EPA Methods 7-7E of 40 CFR Part 60 App. A, or other EPA approved methods.

- e. Sulfur oxides

Sulfur oxide emissions shall be determined by calculating estimated annual emissions from fuel oil sulfur content and fuel consumption. PERMITTEE shall report the results of the calculations once per year. (See §IV(C)(6)(c)(iv) & (v)).

[Auth. §IV(C)(5): MCAQMD Regulation 5, Rule 5.620]

- f. HAPS (See also §V(A)(6))

PERMITTEE shall conduct performance testing for heavy metals emissions at the discretion of the District, but no more frequently than once per annum. Heavy metals emissions shall be monitored using CARB Method 436.

C. D. WOLBACH, Ph.D.
Air Pollution Control Officer
DONNA ROBERTS NASH
Office Manager



COUNTY OF MENDOCINO
AIR QUALITY MANAGEMENT DISTRICT
UKIAH, CALIFORNIA 95482

RECEIVED

APR 22 2002

Permits Office Air-3
U.S. EPA, Region 9

306 East Gobbi Street
Ukiah, California
(707) 463-4354
Fax: (707) 463-5707

April 11, 2002

Nahid Zoueshtiagh
MS AIR-3
US EPA Region IX
75 Hawthorn Street
San Francisco, CA 94105

Subject: Administrative Change to Title V permit # T5-0120 for the Georgia Pacific West, Inc., Fort Bragg, CA facility

Dear Ms. Zoueshtiagh:

In accordance with Title V of the Clean Air Act Amendments of 1990 (Permits) (CAAA) and Regulation 5, Rule 5.540 of the Mendocino County Air Quality Management District (the District), the District hereby gives notice that it has approved administrative changes to Georgia Pacific Western, Inc. (GPW)'s Title V operating permit. The facility is located at 90 West Redwood Avenue, Fort Bragg, California. Enclosed are copies of the replacement pages, in clean and strikeout versions and a copy of the letter to Georgia Pacific Corporation acknowledging the change.

Thank you. If you have any questions, please call the District office at (707) 463-4354.

enclosures

C. D. WOLBACH, Ph.D.
Air Pollution Control Officer

DONNA ROBERTS NASH
Office Manager



306 East Gobbi Street
Ukiah, California
(707) 463-4354
Fax: (707) 463-5707

COUNTY OF MENDOCINO
AIR QUALITY MANAGEMENT DISTRICT
UKIAH, CALIFORNIA 95482

April 9, 2002

Forrest D. Denney,
Environmental Manager – Lumber Division
Georgia Pacific Corporation
P. O. Box 105605
Atlanta, GA 30348

Subject: Administrative Changes to Title V Permit to Operate, Special Conditions.

Dear Mr. Denney:

I am writing in response to your letter dated March 27, 2002, requesting administrative changes to Georgia Pacific's Title V Permit for the Fort Bragg Mill. Per your request the District has removed any language in the permit associated with the burning of urban wood waste and the relevant metals limits. Be advised that by removal of this language, Georgia Pacific will no longer be allowed to use urban wood waste (demolition wood) as fuel for the boilers at the Fort Bragg facility. Attached are replacement pages 39 and 40 of the Title V Permit to Operate. These pages reflect the changes requested. Please replace these pages in all copies of the permit.

Thank you. If you have questions, please call the District office at 707/463-4354.

Sincerely,

C.D. Wolbach, Ph.D.
Air Pollution Control Officer

CDW:dmr

A^Title V\GPW Ltr 4-09-02

V. Plant Wide Special Conditions**A. Fuel Limitations**

1. PERMITTEE shall use only wood waste products (bark, chips, and sawdust) as primary fuel.
2. Fuel oil sulfur content shall not exceed 1.75% on a daily average basis nor 1.55% on an annual average basis, as determined by ASTM Method D115-68 or D129-64
[Auth §V(A)(1) & (2): MCAQMD Permit No. 0120-1-20-82-01-1]
3. Record keeping and reporting:
 - a). PERMITTEE shall maintain a permanent record of daily fuel usage that includes:
 - i. Wood waste (hogged) fuel consumed, measured in bone dry tons.
 - iv. Fuel oil consumed in U.S. gallons.
 - v. Length of time fuel oil consumed.
 - vi. Sulfur content of each lot of fuel purchased.
 - b). PERMITTEE shall provide the records to the District on an annual basis and at such other times as deemed necessary by the District. The annual period shall be from January through December. The report shall be furnished to the District by February 1 of the year following the reporting period.

[Auth §V(A)(6): MCAQMD Permit No. 0120-1-20-82-01-1]

B. Dust Mitigation Measures {District}

PERMITTEE shall at all times operate the plant, log yard or lumber yard, fuel house truck dump, fuel house beach storage pile area, soil amendment areas, and all supporting activities in such a manner as to minimize fugitive dust emissions and ensure compliance with Mendocino County Air Pollution Control District Regulation 1, Rule 430 (fugitive dust emissions). This requirement shall include but not be limited to:

1. The prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or by other means.
2. The application of asphalt, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces which can give rise to airborne dust.
3. The paving of roadways and their maintenance in a clean condition.
4. Limiting vehicle speed to not more than 10 mph on unpaved surfaces in the immediate area of the plant.
5. Keeping soil amendment lay-downs damp before and during tilling operations.
6. The appointment and designation by name of a dust control officer. This person shall have the responsibility and requisite authority to ensure that plant operations, including control of fugitive dust emissions, are in compliance with District regulations at all times. PERMITTEE shall provide to the District in writing the name of the person appointed within thirty days of issuance of this permit, and thereafter upon change.

[Auth §V(B): MCAQMD Regulation 1, Rule 430, Permit No. 0120-1-20-76-10-2]

C. Fugitive Emissions Mitigation Measures **{District}**

PERMITTEE shall inspect all ductwork associated with fugitive dust collection systems for leaks once a month. Any leaks detected shall be repaired within ten days. Any visible accumulation of sawdust on exterior horizontal surfaces (except for storage piles) shall be removed within ten days of discovery.

[Auth §V(C): MCAQMD Regulation 1, Rule 430(a), Permit No. 0120-1-20-76-10-2]

D. Gasoline Storage Tank with Phase II Vapor Recovery **{District Only. Not Federally enforceable}**

PERMITTEE shall operate the gasoline storage and dispensing system in compliance with District Regulation 3, Rule 1.

[Auth §V(D): MCAQMD Regulation 3, Rule 1, Permit No. 0120-]

E. Cooling Tower

PERMITTEE shall insure that the cooling tower meets all requirements of District Regulation 3, Rule 3.

[Auth §V(E): H&SC §39662, MCAQMD Regulation 3, Rule 3]

F. Maintenance of dust collection systems

PERMITTEE shall maintain in good working order without leaks and operate according to manufacturer's specifications system collection devices (inlets), contaminant transport systems (duct work), air movers (blowers), instrumentation (controls), subsystems (sprays, valves), and material feed and containment systems (hoppers and bins).

[Auth. §V(F): MCAQMD Permit No. 0120-1-20-96-53-9 and others]

G. Risk Management Plan

If the PERMITTEE becomes subject to Federal Risk Management Plan requirements, PERMITTEE shall respond in a timely manner.

[Auth §V(G): 40 CFR 70]

V. Plant Wide Special Conditions**A. Fuel Limitations**

1. PERMITTEE shall use only wood waste products (bark, chips, and sawdust) as primary fuel.
2. Fuel oil sulfur content shall not exceed 1.75% on a daily average basis nor 1.55% on an annual average basis, as determined by ASTM Method D115-68 or D129-64

[Auth §V(A)(1) & (2): MCAQMD Permit No. 0120-1-20-82-01-1]

3. PERMITTEE shall not burn more than 300 tons per day of demolition wood waste.
4. ~~Each lot of purchased demolition wood waste shall be sampled by a District approved sampling procedure.~~
5. ~~Metals content in purchased demolition wood waste fuel shall not exceed the following individual limits in milligrams of element per kilogram of demolition wood waste (mg/kg) as determined by US EPA SW846 Methods 3052 (sample preparation) and 6020 (sample analysis):~~

antimony (Sb)	0.01 mg/kg
arsenic (As)	0.08
beryllium (Be)	0.10
cadmium (Cd)	0.01
chromium (Cr)	0.05
copper (Cu)	100
lead (Pb)	10
manganese (Mn)	1.0
mercury (Hg)	0.10
nickel (Ni)	0.10
vanadium (V)	100
zinc (Zn)	10

[Auth §V(A)(3) (5): Federal 40 CFR 50.21(i)(8)(i), MCAQMD]

6. ~~Demolition wood waste cleanliness monitoring~~

~~PERMITTEE shall conduct the following additional monitoring of the demolition wood waste fuel:~~

- i. ~~Each incoming load shall be inspected for unapproved combustibles as listed in District Regulation 2-101.1, Mendocino County Ordinance 3746, and California Health and Safety Code 41800 (except for wood waste).~~
- ii. ~~If unapproved combustibles are observed, they shall be removed or the load shall be rejected.~~

[Administrative Change Added September 26, 2001]

7. ~~Record keeping and reporting:~~

- a). PERMITTEE shall maintain a permanent record of daily fuel usage that includes:

- i. Wood waste (hogged) fuel consumed, measured in bone dry tons.
 - ii. ~~Metals content of each lot of demolition wood waste fuel purchased (see §V(A)(5)).~~
 - iii. ~~Demolition wood waste consumed, measured in bone dry tons.~~
 - iv. Fuel oil consumed in U.S. gallons.
 - v. Length of time fuel oil consumed.
 - vi. Sulfur content of each lot of fuel purchased.
 - vii. ~~Estimated annual emissions of heavy metals from demolition wood metals content and demolition wood consumption.~~
- b). ~~PERMITTEE shall maintain a permanent record of inspections of incoming demolition wood waste that includes:~~
- i. ~~Date~~
 - ii. ~~Source~~
 - iii. ~~Inspector's name~~
 - iv. ~~Quantity of material removed (if any)~~
- ~~[Administrative Change Added September 26, 2001]~~
- c). PERMITTEE shall provide the records to the District on an annual basis and at such other times as deemed necessary by the District. The annual period shall be from January through December. The report shall be furnished to the District by February 1 of the year following the reporting period.

[Auth §V(A)(6): MCAQMD Permit No. 0120-1-20-82-01-1]

B. Dust Mitigation Measures {District}

PERMITTEE shall at all times operate the plant, log yard or lumber yard, fuel house truck dump, fuel house beach storage pile area, soil amendment areas, and all supporting activities in such a manner as to minimize fugitive dust emissions and ensure compliance with Mendocino County Air Pollution Control District Regulation 1, Rule 430 (fugitive dust emissions). This requirement shall include but not be limited to:

1. The prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or by other means.
2. The application of asphalt, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces which can give rise to airborne dust.
3. The paving of roadways and their maintenance in a clean condition.
4. Limiting vehicle speed to not more than 10 mph on unpaved surfaces in the immediate area of the plant.
5. Keeping soil amendment lay-downs damp before and during tilling operations.
6. The appointment and designation by name of a dust control officer. This person shall have the responsibility and requisite authority to ensure that plant operations, including control of fugitive dust emissions, are in compliance with District regulations at all

times. PERMITTEE shall provide to the District in writing the name of the person appointed within thirty days of issuance of this permit, and thereafter upon change.

[Auth §V(B): MCAQMD Regulation 1, Rule 430, Permit No. 0120-1-20-76-10-2]

C. Fugitive Emissions Mitigation Measures **{District}**

PERMITTEE shall inspect all ductwork associated with fugitive dust collection systems for leaks once a month. Any leaks detected shall be repaired within ten days. Any visible accumulation of sawdust on exterior horizontal surfaces (except for storage piles) shall be removed within ten days of discovery.

[Auth §V(C): MCAQMD Regulation 1, Rule 430(a), Permit No. 0120-1-20-76-10-2]

D. Gasoline Storage Tank with Phase II Vapor Recovery **{District Only. Not Federally enforceable}**

PERMITTEE shall operate the gasoline storage and dispensing system in compliance with District Regulation 3, Rule 1.

[Auth §V(D): MCAQMD Regulation 3, Rule 1, Permit No. 0120-]



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

May 10, 2000

Philip W. Towle
Air Pollution Control Officer
Mendocino County Air Quality Management District
306 East Gobbi Street
Ukiah, CA 95482

Re: Proposed Title V Permit for Georgia Pacific West Inc.

Dear Mr. Towle:

Thank you for the opportunity to review the above referenced proposed permit. We had one issue with this proposed permit -- omission of a key clarifying statement on federal enforceability of the permit conditions. This statement which was included in an earlier draft permit, was erroneously deleted from the proposed permit. Based on the revised pages we received on May 1, 2000 from Dr. Dean Wolback of your office, the issue is now resolved, and you may issue the final permit. However, we suggest that cross referencing to various permit conditions throughout the permit be verified before the final permit is issued.

Please note that if the permit is later found to require corrective steps (including, but not limited to, reopening the permit for cause), the expiration of both EPA's review period and the public petition period without EPA objection does not compromise the Agency's authority to take such measures.

Any person may petition EPA within 60 days after the end of EPA's 45-day review period to object to the permit. Since these petitions are generally based on comments raised during the public comment period, it is important to maintain a record of the commenters and issues raised during this process. These records must be made available to the public.

If you have any questions or concerns regarding these matters, please contact Nahid Zoueshtiagh, of my staff, at (415) 744-1261.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Haber", is written over the typed name.

Matt Haber
Chief, Permits Office
Air Division

cc: Ray Menebroker, ARB
Ronald G. Holen, Georgia Pacific West Inc.

Chapter 1 – General Provisions

I. GENERAL PERMIT CONDITIONS

- A. All equipment, facilities and systems installed or used to achieve compliance with the terms and conditions of this Permit to Operate shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions.

[Auth. §I(B): MCAQMD Regulation 1, Rule 240(d)(1)]

- B. In the event of any violation of District Rules and Regulations, PERMITTEE shall notify the District by telephone and take action to end such violation. Notification shall be as soon as possible, but no later than one (1) hour after its detection during normal office hours (8:00 am to 5:00 pm), or one (1) hour after the start of the next regular business day, whichever is sooner. PERMITTEE shall follow up with written notification and description of corrective action within two (2) weeks.

[Auth. §I(B): MCAQMD Regulation 5, Rule 450(b)]

- C. The exceedance of any limiting condition is prohibited without prior application for, and the subsequent granting of, an Authority to Construct permit and, if necessary, a Prevention of Significant Deterioration (PSD) Permit.

[Auth. §I(C): MCAQMD Regulation 1, Rule 200(a)]

- D. All conditions in this permit except Chapter IV, Section V(D), are Federally enforceable.

II PERMIT TERM

This permit shall be valid for 5 years from the date of issuance.

[Auth. §II: 40 CFR 70.6(a)(2); MCAQMD Regulation 5, Rule 5.660]

III COMPLIANCE WITH PERMIT CONDITIONS

- A. PERMITTEE shall comply with all permit conditions. The non-compliance with any permit condition is grounds for permit termination, revocation and re-issuance, modification, enforcement action, or denial of permit renewal.

[Auth. §III(A): 40 CFR 70.6(a)(6)(i); MCAQMD Regulation 5, Rule 5.610(g)(1)]

- B. This permit does not convey property rights or exclusive privilege of any sort.

[Auth. §III(B): 40 CFR 70.6(a)(6)(iv); MCAQMD Regulation 5, Rule 5.610(g)(2)]

- C. PERMITTEE shall not use the “need to hold or reduce a permitted activity in order to maintain compliance” as a defense for non-compliance with any permit condition.

[Auth. §III(C): 40 CFR 70.6(a)(6)(ii), MCAQMD Regulation 5, Rule 5.610(g)(4)]

- D. A pending permit action or notification of anticipated noncompliance does not stay any permit condition.

[Auth. §III(D): MCAQMD Regulation 5, Rule 5.610(g)(5)]

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VIII RECORDKEEPING AND REPORTING

A. Log books

1. Separate logbooks or other records shall be kept on site and contain the information required and described in each equipment subsection (6) under Section **IV** – Equipment Specific Permit Conditions.

[Auth. §**VIII**(A)(1): MCAQMD Regulation 5, Rule 5.455(c)]

2. PERMITTEE will maintain a record of all required monitoring. The record shall include:
 - a. The date, place, and time of sampling or measurement,
 - b. The date the analyses were performed,
 - c. The company that performed the analyses
 - d. The analytical techniques or methods used
 - e. The results of such analyses, and
 - f. The operating conditions existing at the time of sampling or measurement.

[Auth. §**VIII**(A)(2): Federal 40 CFR 70.6(a)(3)(ii)(A)]

3. The recorded information shall be retained for at least five years from date of initial entry, and shall be made available to the District's inspector upon request.

[Auth. §**VIII**(A)(3): Federal 40 CFR 70.6(a)(3)(ii)(B)]

B. Excess Emissions

1. PERMITTEE shall notify the District of any upset conditions, breakdown, scheduled maintenance or any changes in operation or process which causes a violation of emission limitations prescribed by this permit, by District Rules and Regulations, or by State law, or which involves the operability of in-stack monitoring equipment. Notice shall be given as soon as reasonably possible but no later than one (1) hour after its detection during normal business hours. The completion of corrective measures or the shut down of emitting equipment is required within 48 hours of the occurrence of a breakdown condition (96 hours for in-stack monitoring equipment).
2. PERMITTEE shall submit a written report of all excess emissions to the APCO biannually. The reporting periods shall be January through June and July through December. Each report shall be submitted within 30 days of the end of the biannual period and include the following:
 - a. The magnitude of excess emissions, the method of computation, any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions. If CEM data is available, then computation shall be in accordance with 40 CFR 60.13(h).

- b. Specific identification of each period of excess emissions (emissions greater than those allowed during normal operation not including start-up, shutdown, and malfunction) that occurs during startup, shutdown, and malfunctions of the boiler systems. The nature and cause of any malfunction (or probable cause of the malfunction, if unknown) and the corrective action taken or preventative measures adopted shall also be reported.
- c. When no excess emissions have occurred, such information shall be stated in the report.
- d. Excess emissions shall be defined as those exceeding the limits established for normal operation (not start-up or shutdown) in the Permit Units Section of this Permit.

[Auth §VIII(B): Federal 40 CFR 70.6(a)(6)(v), MCAQMD Regulation 5, Rule 5.610(g)(6)]

C. Deviation from permit requirements

- 1. PERMITTEE shall report any deviation from requirements in this Permit to Operate, other than deviations related to excess emissions, to the APCO within 24 hours.
- 2. PERMITTEE shall submit a written monitoring report which summarizes monitoring data for the reporting period and reports all deviations from permit requirements, including deviations attributable to upset conditions, to the APCO every six months. The reporting periods shall be January through June and July through December. These reports shall be submitted within 30 days of the end of each reporting period.
- 3. PERMITTEE shall use District approved forms for the report regarding deviation from permit requirements and shall also include a written statement from the responsible official which certifies the truth, accuracy, and completeness of the report. When no deviations have occurred for the quarter, such information shall be stated in the report.

[Auth. §VIII(C): 40 CFR 70.6(a)(3)(iii); MCAQMD Regulation 5, Rule 5.625]

IX TRANSFER OF OWNERSHIP {District}

This permit is not transferable. In the event of any change in control or ownership of the facilities operated pursuant to this permit, the permit shall be deemed null and void, and PERMITTEE shall surrender it to the District. PERMITTEE shall notify the succeeding owner/operator of the existence of this permit and its conditions by letter, a copy of which shall be sent to the Air Pollution Control Officer. (The new owner/operator will be responsible to arrange for re-issuance of this permit in his/her name.)

[Auth. §IX: MCAQMD Regulation 1, Rule 240(j)]

V. Plant Wide Special Conditions

A. Fuel Limitations

1. PERMITTEE shall use only wood waste products (bark, chips, and sawdust) as primary fuel.
2. Fuel oil sulfur content shall not exceed 1.75% on a daily average basis nor 1.55% on an annual average basis, as determined by ASTM Method D115-68 or D129-64

[Auth §V(A)(1) & (2): MCAQMD Permit No. 0120-1-20-82-01-1]

3. PERMITTEE shall not burn more than 300 tons per day of demolition wood waste.
4. Each lot of purchased demolition wood waste shall be sampled by a District approved sampling procedure.
5. Metals content in purchased demolition wood waste fuel shall not exceed the following individual limits in milligrams of element per kilogram of demolition wood waste (mg/kg) as determined by US EPA SW846 Methods 3052 (sample preparation) and 6020 (sample analysis):

antimony (Sb)	0.2 mg/kg
arsenic (As)	0.1
beryllium (Be)	0.1
cadmium (Cd)	0.1
chromium (Cr)	0.1
copper (Cu)	500
lead (Pb)	100
manganese (Mn)	10
mercury (Hg)	2
nickel (Ni)	0.5
vanadium (V)	100
zinc (Zn)	500

[Auth §V(A)(3)-(5): Federal 40 CFR 50.21(i)(8)(i), MCAQMD]

6. Record keeping and reporting:

PERMITTEE shall maintain a permanent record of daily fuel usage that includes:

- i. Wood waste (hogged) fuel consumed, measured in bone dry tons.
- ii. Metals content of each lot of demolition wood waste fuel purchased (see §V(A)(5).

- iii. Demolition wood waste consumed, measured in bone dry tons.
- iv. Fuel oil consumed in U.S. gallons.
- v. Length of time fuel oil consumed.
- vi. Sulfur content of each lot of fuel purchased.
- vii. Estimated annual emissions of heavy metals from demolition wood metals content and demolition wood consumption.

PERMITTEE shall provide the records to the District on an annual basis and at such other times as deemed necessary by the District. The annual period shall be from January to December. The report shall be furnished to the District by February 1 of the year following the reporting period.

[Auth §V(A)(6): MCAQMD Permit No. 0120-1-20-82-01-1]

B. Dust Mitigation Measures **{District}**

PERMITTEE shall at all times operate the plant, log yard or lumber yard, fuel house truck dump, fuel house beach storage pile area, soil amendment areas, and all supporting activities in such a manner as to minimize fugitive dust emissions and ensure compliance with Mendocino County Air Pollution Control District Regulation 1, Rule 430 (fugitive dust emissions). This requirement shall include but not be limited to:

1. The prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or by other means.
2. The application of asphalt, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces which can give rise to airborne dust.
3. The paving of roadways and their maintenance in a clean condition.
4. Limiting vehicle speed to not more than 10 mph on unpaved surfaces in the immediate area of the plant.
5. Keeping soil amendment lay-downs damp before and during tilling operations.
6. The appointment and designation by name of a dust control officer. This person shall have the responsibility and requisite authority to ensure that plant operations, including control of fugitive dust emissions, are in compliance with District regulations at all times. PERMITTEE shall provide to the District in writing the name of the person appointed within thirty days of issuance of this permit, and thereafter upon change.

[Auth §V(B): MCAQMD Regulation 1, Rule 430, Permit No. 0120-1-20-76-10-2]

C. Fugitive Emissions Mitigation Measures **{District}**

PERMITTEE shall inspect all ductwork associated with fugitive dust collection systems for leaks once a month. Any leaks detected shall be repaired within ten days. Any visible accumulation of sawdust on exterior horizontal surfaces (except for storage piles) shall be removed within ten days of discovery.

[Auth §V(C): MCAQMD Regulation 1, Rule 430(a), Permit No. 0120-1-20-76-10-2]

D. Gasoline Storage Tank with Phase II Vapor Recovery **{District Only. Not Federally enforceable}**

PERMITTEE shall operate the gasoline storage and dispensing system in compliance with District Regulation 3, Rule 1.

[Auth §V(D): MCAQMD Regulation 3, Rule 1, Permit No. 0120-]

E. Cooling Tower

PERMITTEE shall insure that the cooling tower meets all requirements of District Regulation 3, Rule 3.

[Auth §V(E): H&SC §39662, MCAQMD Regulation 3, Rule 3]

F. Maintenance of dust collection systems

PERMITTEE shall maintain in good working order without leaks and operate according to manufacturer's specifications system collection devices (inlets), contaminant transport systems (duct work), air movers (blowers), instrumentation (controls), subsystems (sprays, valves), and material feed and containment systems (hoppers and bins).

[Auth. §V(F): MCAQMD Permit No. 0120-1-20-96-53-9 and others]

G. Risk Management Plan

If the PERMITTEE becomes subject to Federal Risk Management Plan requirements, PERMITTEE shall respond in a timely manner.

[Auth §V(G): 40 CFR 70]